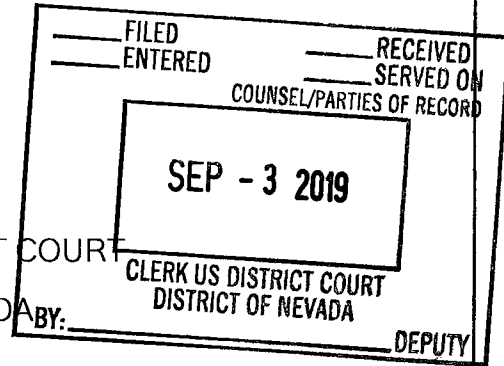


LATONIA SMITH
9748 CANYON LANDING AVE.
LAS VEGAS, NV 89166
725-203-2455
PLAINTIFF IN PROPER PERSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA



LATONIA SMITH,

Plaintiff(s),

-vs-

FENNEMORE CRAIG,

Defendant(s).

CASE NO. 2:19-cv-00824-GMN-EJY

**REPLY IN SUPPORT OF EMERGENCY CROSS-MOTION ISSUING INJUNCTIVE RELIEF,
PERMANENT PROTECTIVE ORDER, AND SEALING MEDICAL RECORDS**

Defendant's did not advance any sensible opposition to Plaintiff's motion for injunctive relief, a permanent protective order, and a sealing of the medical records, which were filed by defendant Shannon Pierce and her abhorrent counsel publicly in case 2:19-cv-00856-GMN-DJA and then filed again in this matter. Plaintiff incorporates the cross-motion herein. Defendant purports that the motion should not be granted because Pierce may need to use the records in a state court case, which is a complete lie. In fact, the records were sealed in the state court (and every other court that Pierce and her cohorts have improperly attempted to use the records after attacking Ms. Smith) **and prevented from use. Her side's attorneys were** further admonished and put on notice by the Nevada courts to cease their reckless actions. Ms. Smith is not a party (or a subject) in the state court case, **thus Pierce's so-called "need" for the records is a** farce. Further, there are other issues with the records, as mentioned by Plaintiff, such as conflicting notes (most of which were never stated by Plaintiff). Nevertheless, Plaintiff

1 should not have to discuss details of medical treatments and/or errors and corrections
2 because it should not be in the public and it should not have even been an issue in front
3 of this court because the records were sealed, under confidentiality, and prevented from
4 distribution prior to the start of this litigation. Defendant had no standing to file such
5 records (basis for sanctions) and continues to have no standing to use such records.

6 **Defense's continued use of the records to advance their own lies and speculations,**
7 which are not even based in a scintilla of fact is also a basis for granting the motion.

8 Dated this 3rd day of September 2019

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10
11 /s/ Latonia Smith
12 LATONIA SMITH
13 9748 CANYON LANDING
14 AVE.
15 LAS VEGAS, NV 89166
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CERTIFICATE OF SERVICE

I certify that I am serving a true and correct copy of the attached REPLY IN SUPPORT on the parties set forth below by:

_____ placing an original or true copy thereof in a sealed envelope with the correct prepaid postage affixed for collection and mailing in the United States Mail, at Las Vegas, Nevada.

 X Certified Mail, Return Receipt Requested of the document(s) listed above to the person(s) at the address(es) set forth below

_____ E-service

_____ Personal delivery through a process server of the document(s) listed above to the person(s) at the address(es) set forth below

Alex Fugazzi and Michael Paretti

SNELL AND WILMER

3883 Howard Hughes Parkway Suite 1100

Las Vegas, NV 89169

702-784-5200

afugazzi@swlaw.com

mparetti@swlaw.com

/s/ Latonia Smith

Plaintiff, In Proper Person

Dated this 3rd day of September 2019